Anh Nguyen
11/25/03 02:35 PM

To: NCIC HPV@EPA
cc:
Subject: Environmental Defense comments on Fluorobenzene (CAS# 462-06-6)

----- Forwarded by Anh Nguyen/DC/USEPA/US on 11/25/2003 02:42 PM -----

Richard_Denison@environmentaldefense.org on 11/25/2003 02:15:35 PM

To: NCIC OPPT@EPA, ChemRTK HPV@EPA, Rtk Chem@EPA, Karen Boswell/DC/USEPA/US@EPA, Edwin.L.Mongan-1@usa.dupont.com
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Subject: Environmental Defense comments on Fluorobenzene (CAS# 462-06-6)

(Submitted via Internet 11/25/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Edwin.L.Mongan-1@usa.dupont.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Fluorobenzene (CAS# 462-06-6).

E.I. du Pont de Nemours & Company, in response to the HPV Challenge, has submitted a carefully prepared and well-organized Robust Summary/Test Plan for fluorobenzene. This chemical is apparently imported by or for a contract manufacturer of the Sponsor, and is used at the points of import in what are described as closed system processes. The Sponsor does not provide any information, however, as to the actual uses of the chemical.

According to the Test Plan, industrial hygiene measures are taken to minimize human exposure. Fluorobenzene residues are recovered from the finished product(s) and recycled back into the process, as are fugitive emissions captured by scrubbers. Waste and byproduct liquids containing fluorobenzene are also said to be captured and disposed of at regulated storage and treatment facilities. Worker exposure is possible during transfers and sampling, according to the Sponsor, and personal protective equipment is employed during these activities.

According to the Sponsor, this chemical qualifies as a closed system intermediate, and therefore repeated dose and reproductive toxicity studies are not required. We will defer to EPA as to whether the Sponsor has sufficiently justified its claim for closed-system intermediate status. We do note that the Sponsor describes several points of potential release, and that the non-zero monitoring data provided indicate some actual release, if not exposure to workers.

Otherwise, a near-complete set of environmental and animal toxicity data is described for this chemical. Studies summarized in the well-written and well-referenced Test Plan, and presented in more detail in what appear to be thorough Robust Summaries, indicate that, if released, fluorobenzene may be somewhat persistent in the environment. Data are described for most other elements or bridged from appropriate studies conducted on the structurally related chemical chlorobenzene. In most cases the cited studies are recent and many were conducted under GLP. The only SIDS element not addressed is that for stability in water, and the Test Plan

proposes that these data be developed through an additional study using OECD Guideline 111.

A minor suggestion for improvement of the Test Plan would be the inclusion of the structural formula and CAS # in the Test Plan. This information is presented in the first page of the Robust Summary, but should be in the Test Plan as well.

In summary, we find this a very well-prepared Test Plan and Robust Summary. Most of the SIDS elements are addressed by data developed for fluorobenzene and the remainder are appropriately bridged from studies of a close chemical analog, chlorobenzene. The Sponsor also proposes to conduct a study to determine the stability of fluorobenzene in water, the one SIDS element not currently addressed by appropriate studies or bridging.

Thank you for this opportunity to comment.

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